

## **Section 7428(c) Validation of Certain Contributions Made During Pendency of Declaratory Judgment Proceedings**

### **Announcement 2010-85**

This announcement serves notice to potential donors that the organization listed below has recently filed a timely declaratory judgment suit under section 7428 of the Code, challenging revocation of its status as an eligible donee under section 170(c)(2).

Protection under section 7428(c) of the Code begins on the date that the notice of revocation is published in the Internal Revenue Bulletin and ends on the date on which a court first determines that an organization is not described in section 170(c)(2), as more particularly set forth in section 7428(c)(1).

In the case of individual contributors, the maximum amount of contributions protected during this period is limited to \$1,000.00, with a husband and wife being treated as one contributor. This protection is not extended to any individual who was responsible, in whole or in part, for the acts or omissions of the organizations that were the basis for the revocation.

This protection also applies (but without limitation as to amount) to organizations described in section 170(c)(2) which are exempt from tax under section 501(a). If the organization ultimately prevails in its

declaratory judgment suit, deductibility of contributions would be subject to the normal limitations set forth under section 170.

Xelan Foundation AKA Significance  
Foundation  
Tampa, FL

Exegetical Institute, Inc.  
Kingsland, GA

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## **IRS and the George Washington University Law School to Sponsor Institute on International Tax Issues**

### **Announcement 2010-86**

The Internal Revenue Service announces the Twenty-Third Annual Institute on Current Issues in International Taxation, jointly sponsored by the Internal Revenue Service and The George Washington University Law School, to be held on December 9 and 10, 2010, at the J.W. Marriott Hotel in Washington, DC. Registration is currently underway for the Institute.

The program, which is intended for international tax professionals, will present a unique opportunity for top IRS and Treasury officials and tax experts, foreign government tax authorities, and leading private sector specialists, to address breaking issues and present key perspectives on new developments.

The first day will also feature sessions on:

- Competent Authority
- Transfer Pricing and Intellectual Property Transfers

- Foreign Tax Credit Developments
- Inbound and Outbound Update: What's New and What's Coming?
- New Reporting and Withholding Tax Rules: Sections 1471-1474
- Evolving Reporting Requirements for Uncertain Tax Positions

The second day will focus on:

- Welcome Address by William J. Wilkins, Chief Counsel of the Internal Revenue Service
- PFICs: Searching for Answers, Looking for Guidance
- Managing International Tax Issues: Cooperation or Controversy?
- Financing the Global Corporation: Working With Section 956
- Ethics Issues in International Tax Practice

On the first day, Douglas H. Shulman, Commissioner, Internal Revenue Service, will deliver the luncheon address. On the second day, Michael F. Mundaca, Assistant Secretary of the Treasury for Tax Policy, will deliver the luncheon address. The second day will also include an "Ask the IRS" panel featuring senior officials from the Service.

Those interested in attending or obtaining more information should contact The George Washington University Law School, at <http://docs.law.gwu.edu/ciit/>. The principal author of this announcement is Patricia A. Bray of the Office of Associate Chief Counsel (International). For further information regarding this announcement, contact Patricia A. Bray at 202-622-5871 (not a toll-free call).